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UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA – CENTRAL DIVISION

LA ALLIANCE FOR HUMAN RIGHTS, et al., . Case No.: 2:20-cv-02291 DOC-KES

Plaintiffs,

v.

CITY OF LOS ANGELES, et al.,

Defendants.

INTERVENOR OCCW STATUS
REPORT

Date: April 7, 2020

Time: 10:00 a.m.

Ctrm: None

Action filed: March 10, 2020

Intervenor Orange County Catholic Worker submits this Status Report in advance of the hearing set for April 7, 2020. Intervenor OCCW is concerned that the remedies offered as long-term proposals to be approved by the Court address the needs of the unsheltered communities. The unsheltered population in Los Angeles City and County is not a monolith and the immediate response cannot be based on moving individuals en masse to a distant location to shelter individuals on parcels of land remote from jobs and services. In short, responding to the needs of the vast majority of people experiencing homelessness is not a binary choice of low-barrier emergency shelters or Permanent Supportive Housing (PSH).

THE ADDITIONAL UNITS CREATED BY PROPOSITION HHH

Intervenor OCCW believes that all of the PSH projects funded by HHH have gone through the initial approval process but very few are currently complete. Twelve of 30 planned “A Bridge Home” emergency shelters are operational, with the VA facility just coming on line, bringing the total number of new shelters to 13. *See* <https://www.lamayor.org/ABridgeHome>.

The Proposition HHH goals were modest at the outset. Since the passage of the measure, the number of people experiencing homelessness increased dramatically and is likely to do so again both because of the existing housing crisis and the impact of the COVID-19 crisis. So, more must be done immediately to meet the exponentially increasing demand for adequate housing in Southern California, both for those now currently unhoused and those at imminent risk of becoming unhoused.

THE LOS ANGELES UNSHELTERED COMMUNITY:

There are several key factors that must inform any plan that the City and County develop for long term solutions. First, a significant percentage of homeless

1 individuals worked prior to becoming homeless, especially adults in families. *See*
2 [https://www.capolicylab.org/employment-among-la-county-residents-](https://www.capolicylab.org/employment-among-la-county-residents-experiencing-homelessness)
3 [experiencing-homelessness](https://www.capolicylab.org/employment-among-la-county-residents-experiencing-homelessness).

4 Those who worked just before becoming homeless generally had earnings
5 well below the poverty level. According to the UCLA study, “[f]or all employed
6 homeless, average annual earnings were only \$9,970 in the year prior to
7 experiencing homelessness.” *See* [https://www.capolicylab.org/wp-](https://www.capolicylab.org/wp-content/uploads/2020/02/Employment-Among-the-Homeless-in-Los-Angeles.pdf)
8 [content/uploads/2020/02/Employment-Among-the-Homeless-in-Los-Angeles.pdf](https://www.capolicylab.org/wp-content/uploads/2020/02/Employment-Among-the-Homeless-in-Los-Angeles.pdf).
9 The average earnings of an unsheltered person is approximately 82% of the 2018
10 Federal Poverty Level (FPL) for a single person household, but only 16% of the
11 Average Median Income (AMI) in Los Angeles County. *Id.*

12 This income chasm is especially critical in the Los Angeles region. In the
13 2019 Point-in-Time (“PIT”) count, Defendants concluded that a person needs to
14 earn at least \$47.52 an hour to afford the median monthly rent in Los Angeles.
15 The risk of falling into homelessness in the region is exceedingly high, with more
16 than 555,000 of the households in the County paying more than half of their
17 monthly income for housing. *Id.*

18 Second, it bears emphasis that 71 % of the unsheltered population does not
19 have a serious mental illness or a substance use disorder.¹ Most unsheltered
20 individuals do not require intensive supportive services, if any, connected to their
21 housing. They require a place that is stable and affordable.

22 Third, according to the 2019 PIT, half of the unsheltered community in the
23 region are women, the majority of whom report that domestic violence or sexual
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¹ [https://www.lahsa.org/documents?id=3437-2019-greater-los-angeles-](https://www.lahsa.org/documents?id=3437-2019-greater-los-angeles-homeless-count-presentation.pdf)
[homeless-count-presentation.pdf](https://www.lahsa.org/documents?id=3437-2019-greater-los-angeles-homeless-count-presentation.pdf).

1 assault or both are significant factors in causing them to become homeless.
 2 Housing for women needs to be responsive to the trauma they experienced.

3
 4 **VACANT CITY-OWNED PROPERTY AVAILABLE FOR**
 5 **DEVELOPMENT:**

6 At the end of 2019, the Defendant City had 56 publicly owned properties
 7 available for land development. The process of approving proposals for these sites
 8 is done by the Los Angeles Housing & Community Investment Development
 9 (“HCIDLA”). See <https://hcidla.lacity.org/land-development>.² Together with the
 10 Office of the City Administrative Officer (CAO), HCIDLA administers the City’s
 11 Comprehensive Homeless Strategy.

12 The 56 locations include: “1) properties transferred to HCIDLA from the
 13 former Community Redevelopment Agency of the City of Los Angeles (CRA/LA);
 14 2) properties acquired by HCIDLA; 3) properties foreclosed upon by HCIDLA,
 15 referred to as Real Estate Owned (REO); 4) properties managed and controlled by
 16 the City of Los Angeles Department of Transportation (LADOT), and 5) sites
 17 identified by the City Administrative Officer as part of the Affordable Housing
 18 Opportunity Sites (AHOS) Program.

19 Since these are designated development sites, the City should readily be able
 20 to provide information to the Court as to which could be used immediately in their
 21
 22

23 ² HCIDLA is responsible for administering Community Block Development
 24 Grants (“CDBG”) which apply to a number of programs, including Neighborhood
 25 Improvement. See e.g.: <https://hcidla.lacity.org/Neighborhood-Development>.
 26 Because of the lengthy time for completing those projects – up to five years – those
 27 available resources are not addressed in this Status Report. However, to the extent
 28 that CDBG funds could be used to address some of the immediate needs, this
 source should also be considered in informing the Court of the options available.
 The same is true with regard to the County CDBG funds, which are administered
 by the Los Angeles County Development Authority (“LACDA”).

1 current condition, which could be made habitable in a few weeks, and which would
2 require bringing in housing to the site – prefab, modular, trailers – and adding
3 utility hook-ups, if necessary, to provide accommodations.

4 5 **VACANT CAL TRANS PROPERTY IN LOS ANGELES**

6 Governor Newsom directed Cal Trans to provide a list of vacant properties
7 available for housing. At the March 19, 2020 hearing, the Illumination Foundation
8 identified a number of Cal Trans properties in the City and County where facilities
9 could be placed. The list is also in an interactive map at:

10 [https://cadgs.maps.arcgis.com/apps/webappviewer/index.html?id=c7f256b23d5e42](https://cadgs.maps.arcgis.com/apps/webappviewer/index.html?id=c7f256b23d5e421885422c518db253b3)
11 [1885422c518db253b3](https://cadgs.maps.arcgis.com/apps/webappviewer/index.html?id=c7f256b23d5e421885422c518db253b3). The map shows 19 sites available for free in Los Angeles
12 County, including Los Angeles City.

13 14 **HOTELS AND MOTELS:**

15 Both the City and County should purchase or master lease motels and
16 smaller hotels to provide immediate, appropriate and affordable housing for
17 unhoused individuals and families. They do not require construction or
18 connections to utilities, they are ready now, they are the equivalent of a Single
19 Room Occupancy facility. Whether because a person is underemployed or
20 unemployed, on Social Security or disability, the cost of putting a roof over one's
21 head is out of reach for a significant percentage of people in this region. Any plan
22 for long-term solutions must take into account the reality that the majority of
23 unhoused persons will continue to have monthly income that is inadequate to pay
24 for any housing in this region.

25
26 There are numerous properties the City and County could have available
27 immediately for housing, with care not to displace individuals who currently live in
28 low-cost motels and hotels because they are unable to find affordable rental

1 housing. The benefit from these properties is that they are already connected to
2 utilities and plumbing. Most small hotels and motels will have a mini-fridge,
3 microwave and coffee-maker in each unit. They are generally in areas where there
4 is already access to food resources.

5 To give a few examples, there are several motels and hotels in the Westlake
6 area, just outside of downtown and accessible to transportation. These include a
7 hotel at 1543 W Olympic Blvd, America's Best Value Inn at 1123 W. 7th Street, and the
8 Travel Inn at 401 S. Westlake. There are similar facilities throughout Los Angeles City
9 and County. Other examples of potential locations include the Lincoln Park Motel on
10 Parkside Avenue, the Antonio Hotel on Soto Street and America's Best Value Inn in
11 Hollywood.

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14 Dated: April 6, 2020

15 Respectfully submitted,
16 ELDER LAW & DISABILITY RIGHTS CENTER
17 LAW OFFICE OF CAROL A. SOBEL
18 SCHONBRUN, SELOW, HARRIS & HOFFMAN

19 By: /s/ Carol A. Sobel
20 CAROL A. SOBEL
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